WEHRAN ENGINEERING
Consulting Engineers

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DEPT. ENVIRONMENTAL PROTECTION
NEWARK OFFICE

Mr. Peter Lynch
Basin Manager, Hackensack River Basin
New Jersey Department of Environmental Protection
Water Resources Division
1100 Raymond Blvd.
Newark, New Jersey 07102

RE: L.E. Carpenter and Company
Wharton, New Jersey

Dear Mr. Lynch:

I feel our meeting and tour of the L.E. Carpenter site was productive in that it brought all parties together for a meaningful exchange of ideas and also gave those members of your contingent who had not yet viewed the facility such an opportunity. The first hand inspection of the area of concern, is particularly vital to a full appreciation of the proposals we will be formulating for future management of the waste.

As we discussed at our meeting, Wehran Engineering has be retained to undertake a comprehensive waste management study for L.E. Carpenter and Company. We would like to take this opportunity to outline the proposed scope of our work to the Department and to set forth a time table for its performance. It is our intention to involve the DEP to the fullest extent possible in all aspects of the waste management planning and its eventual implementation. We feel your input to and cognizance of the program being undertaken is vital to its ultimate success.

SCOPE OF WORK

1. Waste Characterization

A representative sample of the PVC sludge is being analyzed for the following parameters:

Physical Appearance (i.e. odor, texture, etc.)
Dry Weight
Ash Weight
Flammability (Flash Point)
Solubility Properties
Reactivity
Free Oily Substances (Infrared Analysis of any free oil)
Total Phenols
Gas Chromatographic analysis for Purgable, Chlorinated Organics, with specification of the PVC Monomer

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Phthalates
Total Chlorinated Organic Scan (Non-volatile)
Lead
Tin
Antimony
Barium
Copper
Chromium
Zinc
Cobalt
Cadmium
Leachability study employing distilled water, a $CaCO_3$ buffer solution, and dilute acetic acid (pH 5) in what represents a modified version of the EPA toxic extractant procedure. Leachate would be analyzed for a number of appropriate analyses.

Waste Management Study

The objective of our work would be to prepare a Waste Management Study addressing all concerns pertinent to the future management of the previously-disposed waste. For the purposes of this outline, it has been assumed that the study would lead to a recommendation of excavation and removal of the waste from the site, as opposed to a scheme involving management of the waste in-situ. It is anticipated in view of the limited areal extent and volume of the previously disposed waste that the economic and environmental considerations would greatly favor this alternative. In the event that this presumption proves not to be the case, then the study would be reworked to address the concerns of in-situ management. For the time being, however, the following outline of work is predicated upon the concept that excavation and removal of the waste from the L.E. Carpenter represents the most practical and effective waste management strategy.

It is envisioned at this time that the study would address the following considerations.

(1) An assessment of the previously described waste characterization efforts with the objective being to evaluate whether the waste would be considered as a hazardous or non-hazardous waste. The evaluation would take into consideration the existing state definitions of hazardous wastes as well as the proposed definitions under the federal RCRA Regulations.

(2) Definition of viable disposal options (i.e. Secure Landfill, Sanitary Landfill).

(3) Recommendations for the safe and proper excavation, handling and shipment of the waste to its ultimate disposal site.

(4) Renovation and future management of the waste disposal site.

(5) The need, in view of the waste character and classification, of ground and surface water monitoring facilities and if such facilities are recommended, the frequency of sampling and analytical parameters required to evaluate the effectiveness of containment.

In addition to the aforementioned study, Wehran Engineering would present L.E. Carpenter with a breakdown of the anticipated costs of the recommended remedial program as compared to other conceivable alternatives. Only in this way can a program representing the optimal mix of environmental security and economic feasibility be developed.

We anticipate that barring any unforeseen difficulties, the above-mentioned waste management report would be completed approximately 7 weeks from the date of this letter. The Waste Characterization, itself, would be complete in approximately two weeks and would be forwarded to the Department at that time. We trust this schedule is acceptable and look forward to working closely with the Department on this project.

If you have any comments or proposed modifications to the above-outlined program, please contact us as soon as possible so that we may maintain the project's schedule of performance.

Very truly yours,

WEHRAN ENGINEERING CORPORATION

Robert D. Mutch (w/JA.)

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